



October 14, 2016

Ashley Peters
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670-6114.

Re: Comments on West San Joaquin River Watershed Groundwater Quality Management Plan

Dear Ms. Peters,

Thank you for the opportunity to comment on the Groundwater Quality Management Plan (GQMP) for the West San Joaquin River Watershed. The West San Joaquin Waste Discharge Order identifies this plan as “the key mechanism under this Order to help ensure that waste discharges from irrigated lands are meeting Groundwater Receiving Water Limitation III.B.” In that context, we find this order to be lacking in specific performance measures and timelines. As written, the plan contains no assurances that adequate steps will be taken to meet receiving water limitations.

We do appreciate that the plan makes a commitment to identify and properly destroy abandoned wells and to implement wellhead protection practices on 100% of operations in high vulnerability areas (HVAs) in the first year after adoption of the GQMP. We think these are important actions that will help eliminate conduits to groundwater contamination.

According to the order, this plan must “include a schedule for implementing practices that are known to be effective in partially or fully protecting groundwater quality.” The GQMP identifies current practices and the acreage associated with such practices but fails to provide a strategy or schedule for ensuring that their use is expanded.

What most disturbs us is that this plan, which covers areas known to be either susceptible to contamination or where water quality standards are already exceeded, includes no additional requirements, beyond those in the order, to measure or reduce the rate of nitrogen loading through nutrient application. The order clearly requires a higher standard for these plans. We suggest the following as a few examples of additional measures that might be incorporated into the plan:

- Include a calculation of potential nitrogen loading to groundwater through the HVA, and identify those areas that should be targeted for additional outreach and education to reduce local nitrogen loading.



- Actively encourage growers to use the nitrogen in irrigation water as an offset for fertilizer application. These efforts and their success should be reported in the annual report.
- Initiate a pilot groundwater recharge program in one or more Priority 1 areas within 3 years in order to determine the impact of targeted recharge on drinking water supply wells that currently exceed the MCL.
- Establish performance measures for the education program to ensure that best practices for nutrient and irrigation management are implemented on 100% of irrigated acreage in high priority areas within 4 years.
- Provide a schedule for meeting receiving water limitations, as required by the order.

In addition to these substantive comments, we do have a question about Table 1-2, which identifies the acreage of HVAs within the region and separately includes a “high well vulnerability area” designation for wells outside the HVAs. It’s not clear why only a ½-mile radius around the well is designated as a high well vulnerability area; nor is any mention made of how these wells and the area around them will be monitored to determine whether these areas need to be expanded. At minimum, we suggest following the example of the UC Davis Nitrate Report, which uses a 1-mile radius around wells to determine vulnerability. The order does not cede all monitoring authority to the trend monitoring plan; it requires ongoing monitoring to determine the effectiveness of the GQMP in addressing contamination. We recommend that more information about these areas be included in the plan.

Thank you for providing us the opportunity to comment on these documents. We look forward to working with your staff and the coalitions on the implementation of this and other Groundwater Management Plans

Sincerely,

A handwritten signature in blue ink, appearing to read "PSS", enclosed within a blue oval.

Phoebe Seaton
Leadership Counsel for Justice and Accountability

A handwritten signature in black ink, appearing to read "Laurel Firestone".

Laurel Firestone
Co-Executive Director and Attorney at Law
Community Water Center

A handwritten signature in black ink, appearing to read "Jennifer Clary".

Jennifer Clary
Water Policy Analyst
Clean Water Action